

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS

V.

CA. NO. 04-1350 (GMS)

DR. SYLVIA FOSTER, ETAL

FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE
2007 JAN 10 PM 4:49
RC
summa

MOTION FOR DISCLOSURE,
FOR HAND WRITTEN INFORMATION
TO BE TRANSLATED INTO USABLE
FORM, PURSUANT TO RULE 37.

DATE: 1/8/07

Jimmie Lewis
SBI # 506622
DEL. CORR. CENTER
1181 PADDOCK RD
SMYRNA, DE 19977

THE PLAINTIFF'S REQUEST VIA MOTION FOR DISCLOSURE IS IN REGARDS TO THE DOCUMENTS PRODUCED IN ACCORDANCE TO THE PLAINTIFF'S FIRST MOTION FOR DISCOVERY FILED 8/9/2006, DE. 75, FOR WHICH THE DEFENDANT DR. SYLVIA FOSTER RESPONDED ON 9/26/2006, DE. 81.

THE DILEMMA IS THAT THE FOLLOWING DOCUMENTS ARE NOT IN USABLE FORM, DUE TO SAID HAND WRITTEN INFORMATION NOT BEING LEGIBLE. FOR THE AFOREMENTIONED REASONS, THE PLAINTIFF HEREBY REQUEST THAT THE DEFENDANT DR. SYLVIA FOSTER PROVIDE TYPED MEMOS OF THE FOLLOWING HANDWRITTEN INFORMATION.

- 1.) PROVIDE A TYPED MEMO OF THE HANDWRITTEN INFORMATION NOTED ON THE D.P.C SECLUSION / RESTRAINT PATIENT FEEDBACK FORM(S), PROVIDED VIA DISCOVERY, BECAUSE SAID HAND WRITTEN INFORMATION IS NOT LEGIBLE.
- 2.) PROVIDE A TYPED MEMO OF THE HANDWRITTEN INFORMATION NOTED ON THE D.P.C SECLUSION OR RESTRAINT FORMS, PROVIDED VIA DISCOVERY, BECAUSE SAID HAND WRITTEN INFORMATION IS NOT LEGIBLE.
- 3.) PROVIDE A TYPED MEMO OF THE HANDWRITTEN INFORMATION NOTED ON THE D.P.C DOCTOR ORDER SHEETS DATING FROM 5/21/04 TO 6/25/04, PROVIDED VIA DISCOVERY, BECAUSE SAID WRITTEN INFORMATION IS NOT LEGIBLE.
- 4.) PROVIDE A TYPED MEMO OF THE HANDWRITTEN INFORMATION NOTED ON THE D.P.C INCIDENT REPORTS PROVIDED VIA DISCOVERY, BECAUSE SAID HANDWRITTEN INFORMATION IS NOT LEGIBLE.

5.) PROVIDE A TYPED MEMO OF THE HAND WRITTEN INFORMATION NOTED ON THE FCM CONSULTATION REQUEST DATED JUNE 9, 2004 PROVIDED VIA DISCOVERY, BECAUSE SAID WRITTEN INFORMATION IS NOT LEGIBLE.

6.) PROVIDE A TYPED MEMO OF THE HAND WRITTEN INFORMATION NOTED ON THE D.P.C SOCIAL ASSESSMENT, 6 PAGES. DATED 5/24/04 PROVIDED VIA DISCOVERY, BECAUSE SAID HAND WRITTEN INFORMATION IS NOT LEGIBLE

7.) PROVIDE A TYPED MEMO OF THE HAND WRITTEN INFORMATION NOTED ON THE D.P.C CONSULTATION REQUEST AND REPORT, DATED JUNE 9, 2004, PROVIDED VIA DISCOVERY, BECAUSE SAID HAND WRITTEN INFORMATION IS NOT LEGIBLE.

8.) PROVIDE A TYPED MEMO OF THE HAND WRITTEN INFORMATION NOTED ON THE D.P.C DEPARTMENT OF HEALTH AND SOCIAL SERVICES, INSTITUTIONAL ADMISSION RECORD DATED 5/21/04, PROVIDED VIA DISCOVERY, BECAUSE SAID HAND WRITTEN INFORMATION IS NOT LEGIBLE.

9.) PROVIDE A TYPED MEMO OF THE HAND WRITTEN INFORMATION NOTED ON THE D.P.C INTERDISCIPLINARY GROUP THERAPY DOCUMENTATION SHEET, PROVIDED VIA DISCOVERY, BECAUSE SAID HAND WRITTEN INFORMATION IS NOT LEGIBLE.

10.) PROVIDE A TYPED MEMO OF THE HAND WRITTEN INFORMATION NOTED ON THE D.P.C PROGRESS NOTES, DATING FROM 5/21/04 TO 6/25/04 PROVIDED VIA DISCOVERY, BECAUSE SAID HAND WRITTEN INFORMATION IS NOT LEGIBLE.

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED PLAINTIFF JIMMIE LEWIS
DOE HEREBY CERTIFY ON THIS 8TH, DAY OF
JAN, 2007 THAT I DID MAIL ONE TRUE
AND CORRECT COPY OF THE MOTION FOR DISCLOSURE
FOR HAND WRITTEN INFORMATION TO BE
TRANSLATED INTO USABLE FORM, PURSUANT
TO RULE 37, BY U.S. POSTAL TO THE FOLLOWING:

CLERK OF THE COURT (GMS)
UNITED STATES DISTRICT COURT
844 N. KING ST, LOCK BOX 18
WILMINGTON, DELAWARE 19801

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LOUIS J. RIZZO JR
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DATE : 1/8/07

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